

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

v.

LESHAWN INGRAM,
a/k/a "Shawny" a/k/a "Scrap,"

Defendant.

CASE NO. 14-22M

MOTION FOR DETENTION HEARING

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2014 MAR -6 PM 4:12

NOW COMES the United States of America, by and through its attorneys, Charles M. Oberly, III, United States Attorney for the District of Delaware, and Mark M. Lee, Assistant United States Attorney for the District, and moves for the pretrial detention of the Defendant, pursuant to 18 U.S.C. § 3142(e) and (f). In support of the Motion, the United States alleges the following:

1. **Eligibility of Case.** This case is eligible for a detention order because case involves (check all that apply):

_____ Crime of violence (18 U.S.C. § 3156)

_____ Maximum sentence life imprisonment or death

 X 10+ year drug offense

_____ Felony, with two prior convictions in above categories

_____ Minor victim

_____ Possession/ use of firearm, destructive device or other dangerous

weapon

_____ Failure to register under 18 U.S.C. § 2250

 X Serious risk Defendant will flee

_____ Serious risk obstruction of justice

2. **Reason For Detention.** The Court should detain Defendant because there are no conditions of release which will reasonably assure (**check one or both**):

 X Defendant's appearance as required

 X Safety of any other person and the community

3. **Rebuttable Presumption.** The United States **will not** invoke the rebuttable presumption against Defendant under § 3142(e). (If yes) The presumption applies because (**check one or both**):

 X Probable cause to believe Defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. § 924(c), or a federal crime of terrorism, or a specified offense (_____) with minor victim

_____ Previous conviction for "eligible" offense committed while on pretrial bond

4. **Time For Detention Hearing.** The United States requests the Court conduct the detention hearing,

_____ At first appearance

 X After continuance of 3 days (not more than 3).

5. **Temporary Detention.** The United States request the temporary detention of the Defendant for a period of _____ days (not more than 10) so that the appropriate officials can be notified since (**check 1 or 2, and 3**):

1. At the time the offense was committed the Defendant was:

_____ (a) on release pending trial for a felony;

_____ (b) on release pending imposition or execution of sentence,
appeal of sentence or conviction, or completion of sentence for an offense;

_____ (c) on probation or parole for an offense.

_____ 2. The Defendant is not a citizen of the U.S. or lawfully admitted for
permanent residence.

_____ 3. The Defendant may flee or pose a danger to any other person or the
community.³

6. **Other Matters.**

DATED this 6th day of March 2014

Respectfully submitted,

CHARLES M. OBERLY, III
UNITED STATES ATTORNEY

/s/ Mark M. Lee

BY: _____

Mark M. Lee
Assistant United States Attorney